## SIMMONS JANNACE DELUCA, LLP

ATTORNEYS AT LAW 43 CORPORATE DRIVE HAUPPAUGE, NEW YORK 11788-2048 (631) 873-4888 FAX (631) 873-4889

Counsel

Susan B. Jannace Ross M. Chinitz^

\*Also Admitted NJ ^Also Admitted CT

USDC SDNY

DOCUMENT

Mary C. Azzaretto Daniel P. Borbet Irina Feferman\*

Kevin P. Simmons

Steven D. Jannace

Allison C. Leibowitz

Michael C. Lamendola\*

Sal F. DeLuca^

lan E. Hannon Matthew C. Maloney

(See p. 2)

March 17, 2022

ELECTRONICALLY FILED Via ECF Honorable Nelson Stephen Roman 3/21/2022 DATE FILED: United States District Court Southern District of New York 300 Quarropas Street

Vasquez, Ivan v. Costco Wholesale Corporation, et al

Docket No.: 20-cv-7059 Our File No: 537-9531

White Plains, New York 10601-4150

Dear Judge Roman:

defendant, Costco represents office Corporation ("Costco") i/s/h/a Costco Wholesale Corporation and Costco Wholesale Membership, Inc., in connection with the abovereferenced matter. Kindly allow this correspondence to serve as a joint request for an adjournment of the April 7, 2022 case management conference.

submitted parties 2022, the 13, March application to Magistrate Judge Andrew E. Krause requesting a brief extension of the discovery deadlines in order to complete the depositions of plaintiffs' experts who were not available on the dates noticed. (D.E. #56). By Order dated March 15, 2022, Magistrate Judge Andrew E. Krause granted the parties' request and extended the discovery deadlines to April 22, 2022. As this discovery will not be completed before the April 7, 2022 case management conference, the parties respectfully request that the conference be adjourned to a date after April 22, 2020. parties propose the following alternative dates: May 3, 2022, May 4, 2022 or any time after 1:00 p.m. on May 10, 2022.

The Court previously granted the parties' prior requests to adjourn the conference on September 9, 2021, November 24, 2021 and February 2, 2022.

March 17, 2022 Page 2

Thank you for this opportunity to address the Court in this matter.

Respectfully submitted,

s/ Ian E. Hannon Ian E. Hannon

IEH: 698833

cc: Via ECF

Mariangela Chiaravalloti, Esq. Friedman, Friedman & Chiaravalloti 65 Broadway, Suite 1604 New York, New York 10006

The parties' joint request to adjourn the telephonic Status Conf. from Apr. 7, 2022 until May 10, 2022 at 2:00 pm is GRANTED. The parties are directed to this Court's Order (ECF No. 43) for dial-in instructions. Clerk of Court is requested to terminate the motion (doc. 58).

Dated: White Plains, NY March 21, 2022

SO ORDERED:

HON. NELSON S. ROMÁN UNITED STATÉS DISTRICT JUDGE.